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GREENVILLE COUNTY ECONOMIC DEVELOPMENT CORPORATION

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July 12, 2005

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David H. Gordon, Ph.D.
Acting Field Supervisor
U. S. Fish and Wildlife Service
176 Croghan Spur Road
Charleston, South Carolina 29407

Re: FWS Log No. 4-6-05-438

Dear Dr. Gordon:

I am responding to your letter dated June 30, 2005, to Mr. William Mullins of Baker & Miller, PLLC, regarding Greenville County Economic Development Corporation's (GCEDC) petition to the Surface Transportation Board (STB) to abandon the former Greenville and Northern Railroad (GNRR) from north of Travelers Rest to downtown Greenville, SC, and to discontinue service on another 3.29 miles of line. It is the intent of the GCEDC to pursue the "Rails-to-Trails" program as an interim use of the rail line.

Mr. Carlton Owen, a certified wildlife biologist with The Environmental Edge, LLC, who is a leading volunteer in clearing rank vegetation from the rail line, has offered to assist GCEDC in responding to your letter regarding our plans and any potential impacts to the two federally listed plants, bunched arrowhead and dwarf-flowered heartleaf. Mr. Owen has been in contact with Lora Zimmerman in your office to discuss options and plans to move forward in a way that minimizes any negative impacts to the aforementioned plants. The GCEDC Board has authorized Mr. Owen to coordinate our efforts to comply with the U. S. Fish and Wildlife Service's requirements in this matter as outlined in this letter.

As GCEDC is not seeking abandonment of the separate 3.29 mile (southern) segment which is not located within the same general area as known or suspected populations of either plant, we are restricting our response to the GNRR (northern) segment of line. The GCEDC purchased the GNRR in 1999 after all rail service had ceased (although

one legal challenge is pending by one former rail customer). Nothing has been done to maintain the bulk of the rail corridor over the past six years; thus, most segments of the line have become clogged with dense tree, scrub, and vine cover.

In May 2005, GCEDC granted permission to a group of volunteers to clear unwanted vegetation from the rail corridor (rails and bed) in preparation for a feasibility review regarding long-term uses of the property. Clearing at this time is being limited essentially to that portion of the line extending between the widths of crossties. That said, it is our understanding that such clearing in-and-of-itself should be conducive to the sun loving plants that would have otherwise been shaded out by the rank vegetation. We would expect that if the line is later used as an "unimproved temporary trail" (with rails and ties still in-place) our plans would at a minimum have no impact on the species and perhaps - should they be present - actually serve to benefit them. In some areas we would propose to widen the cleared corridor area slightly to enhance views and vistas.

There are potential other changes to the corridor. As we seek abandonment with plans for federal rail banking, our intent would include such options as later removing the rails and ties and grooming the rail bed to enhance walking and biking. Later, should funds become available, we may seek to pave the bed for enhanced trail/recreational access. In either case, activity would be limited to the trail bed and an area that has been maintained as transportation corridors for almost 125 years. None of these plans envision any activities that would alter water tables or flows in nearby streams, rivers, or swamps. In fact, our ability to gain access to otherwise difficult areas should help us maintain natural flows through culverts and trestles.

This proposed voluntary survey would be restricted to GCEDC property. Only fully qualified personnel would be involved in the survey. Dr. Joe Pollard, a professional botanist, professor, and chair of the Biology Department of Furman University, has agreed to work with Carlton Owen to do an assessment of the rail corridor where it passes, seeps, or crosses creeks and swamps to ascertain the presence of either of the plants in question. Additionally, Dr. Gill Newberry, Professor of Biology, University of South Carolina Upstate, has also agreed to team-up with Dr. Pollard for this survey. Dr. Newberry specializes in endangered plants and has extensive knowledge of the two species and populations in question.

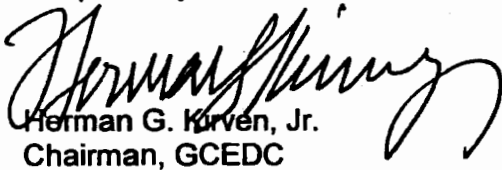
Should the work of these two scientists determine the presence of any new or previously unreported populations of either plant within the immediate premises of the corridor we will report those results to you and will take steps to ensure that future activities such as corridor maintenance with hand equipment or herbicides does not affect such populations. For instance, should it be determined that either species is present; we would restrict herbicide use in any area that may impact either listed species.

Other activities could possibly affect the plants. It has been reported that a local land trust is in discussions with one or more private property owners in an area that might host one or both of the plants. Should those plans move forward, when taken in combination with our commitment to passive recreation in the rail bed and voluntary surveys and planning, the long-term conservation of the plants, should they exist in the area, will be enhanced.

In closing, we are asking that you consider our plans and commitments as sufficient to meet the obligations of the Service's request and that you communicate your consultation with us to the Surface Transportation Board and withdraw any formal requirements that might delay the formal abandonment process as abandonment by-and-of-itself under our plans for rail banking will have no impact on the species in question.

Should you have any questions about the technical merits of our proposal, please contact Mr. Carlton Owen at (864) 232-0909. Thank you for your consideration.

Respectfully submitted,


Herman G. Kurven, Jr.
Chairman, GCEDC

Cc: GCEDC Board
Mr. Carlton Owen
Mr. Bill Mullins
Mr. Andy White